

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
AUTOHAUS ACQUISITION, INC., :  
d/b/a VICTORY VOLKSWAGEN, :  
Debtor :  
  
LAWRENCE G. FRANK, TRUSTEE : JOINTLY ADMINISTERED TO:  
IN BANKRUPTCY FOR AUTOHAUS :  
ACQUISITION, INC., d/b/a : THREE ARROWS ENTERPRISES,  
VICTORY VOLKSWAGEN, : INC., ET AL  
Plaintiff :  
v. : CASE NO. 1:09-bk-07161  
SUSQUEHANNA BANK, : ADVERSARY  
Defendant : NO. 1:10-ap-00212 RNO

**TRUSTEE'S RESPONSE TO AFFIRMATIVE DEFENSES**

TO THE HONORABLE ROBERT N. OPEL, II, BANKRUPTCY JUDGE:

COMES NOW, Lawrence G. Frank, Trustee in Bankruptcy and Plaintiff in the above-captioned adversary proceeding, and responds to the Defendant's affirmative defenses, respectfully stating in support thereof:

16. Denied.

17. Denied.

18. Denied.

19. Denied. Plaintiff clearly has standing to bring the adversary proceeding at bar.

20. Denied.

21. Denied.
22. Denied.
23. Denied.
24. Denied.
25. Denied.
26. Denied.
27. Denied.
28. Denied.
29. Denied.

WHEREFORE, the Plaintiff respectfully requests this Honorable Court to rule in favor of the Plaintiff and against the Defendant as respects the Defendant's affirmative defenses.

RESPECTFULLY SUBMITTED BY:

/s/Lawrence G. Frank  
LAWRENCE G. FRANK, ESQUIRE  
THOMAS, LONG, NIESEN AND KENNARD  
Attorney ID #15619  
212 Locust Street, Suite 500  
Harrisburg, PA 17101  
Ph: (717) 234-7455  
Fx: (717) 236-8278  
Email: [lawrencefrank@earthlink.net](mailto:lawrencefrank@earthlink.net)

TRUSTEE IN BANKRUPTCY

**CERTIFICATE OF SERVICE**

AND NOW, this 6<sup>th</sup> day of March, 2011, I, Lawrence G. Frank, Esquire, hereby certify that I this day electronically filed the foregoing document with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address:

U.S. Trustee - [ustpreregion03.ha.ecf@usdoj.gov](mailto:ustpreregion03.ha.ecf@usdoj.gov)

Donald R. Geiter, Esq - [dgeiter@barley.com](mailto:dgeiter@barley.com)

/s/Lawrence G. Frank  
LAWRENCE G. FRANK, ESQUIRE  
THOMAS, LONG, NIESEN AND KENNARD  
212 Locust Street, Suite 500  
Harrisburg, PA 17101  
Ph: (717) 234-7455  
Fax: (717) 236-8278  
Email: [lawrencefrank@earthlink.net](mailto:lawrencefrank@earthlink.net)

Trustee-in-Bankruptcy